

National Aeronautics and Space Administration
George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812



October 22, 2010

Reply to Attn of LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/William J. Bierbower

SUBJECT: Blanket approval for NASA Employees to attend the 22nd Annual Dr. Wernher von Braun Memorial Dinner as Invitees of American Astronautical Society

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

A group of NASA employees who are speaking at the 3rd Wernher von Braun Memorial Symposium have been invited by the American Astronautical Society to attend the 22nd Annual Dr. Wernher von Braun Memorial Dinner. The Symposium is scheduled for October 25 - 27, 2010, at the University of Alabama in Huntsville. The National Space Club (NSC) is the sponsor of the dinner.

This office has made a determination that the von Braun Memorial Dinner on October 27 at the U.S. Space & Rocket Center Davidson Center for Space Exploration will be a widely-attended gathering of NSC members, NASA and military members, and local elected officials, as well as other community leaders. Besides 150 Marshall Space Flight Center employees, representatives of the U.S. Army Aviation and Missile Command, the U.S. Army Space and Missile Defense Command, U.S. Army Forces Strategic Command, and the Missile Defense Agency have been invited. It is also expected that community leaders, state and local officials, and representatives of private industry will be in attendance. The event is valued at \$75.00 per person and approximately 850 individuals have been invited to attend. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

In regard to the employees who are invitees of the American Astronautical Society (AAS), who will be speaking at the Symposium, it is in the interest of the agency for them to attend the von Braun Memorial Dinner because it will further agency programs and operations. AAS is not the sponsor of the Dinner. More than 100 people are expected to attend the Dinner, and the gift of free attendance has a market value of \$75, which is less than the \$285 limit. Therefore, these employees may accept free attendance at the Dinner.

Senior NASA employees whose duties may substantially affect the NSC, or a majority of its members, or the American Astronautical Society, are not covered in this determination and should seek a specific determination from this office, or their Center Legal Office, pursuant to 5 CFR 2635.204(g)(3)(i) regarding their participation in this event.

Neither the National Space Club nor the American Astronautical Society are lobbying organizations and are not registered as such under the Lobbying Disclosure Act.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.

A handwritten signature in black ink, appearing to read "W. J. Bierbower", with a stylized flourish at the end.

William J. Bierbower
Chief Counsel